# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

STANDARD FIRE INSURANCE COMPANY, Plaintiff	) )
v.	) Civil Action No. ) 04-12244-GAO
CROSBY YACHT YARD, INC. AND,	)
OYSTER HARBORS MARINE, INC.,	)
Defendants.	)
	)

# DEFENDANT CROSBY YACHT YARD INC.'S MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS (PARTIALLY ASSENTED TO)

NOW COMES the Defendant, Crosby Yacht Yard, Inc. by and through its undersigned attorneys, and moves that the time for filing dispositive motions be extended up to and including May 31, 2007.

As reason therefor, Defendant states the additional time is necessary and appropriate because of the new deadline for expert discovery, the varying nature of the claims and the complex issues presented. While it is unclear whether there is an established deadline for the filing of dispositive motions, defendant is filing this motion in an abundance of caution.

All counsel, except one, assent to this motion. Defendant's counsel was not able to reach the other in advance of filing this motion.

WHEREFORE, Defendant, Crosby Yacht Yard, Inc. prays that the time which to file dispositive motions be extended up to and including May 31, 2007.

By its attorneys,

/s/ Seth S. Holbrook

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Assented to:

\_/s/ Robert E. Kiely\_\_

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## Local Rule 7.1(a)(2) Certificate

I certify that attempted to resolve or narrow the issues presented by this motion with opposing counsel who did not assent but was unable to do so.

### .....Seth S. Holbrook

## Certificate of Service

I hereby certify that on February 28, 2007, I electronically filed Defendant Crosby Yacht Yard Inc.'s Motion for Extension of Time to File Dispositive Motions with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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